GOODWIN

Christopher T. Holding
617.570.1679
CHolding@goodwinprocter.com

Goodwin Procter LLP
100 Northern Avenue
Boston, MA 02210

goodwinlaw.com
+1 617 570 1000

MEMO ENDORSED

February 23, 2017

Application granted.
The Clerk of Court is directed to remove the below referenced Defendants from dockets 16mc7000, 16mc7229, 16mc7987, and 16mc8911.

SO ORDERED:

WILLIAM H. PAULEY III
U.S.D.J.

3/13/17

VIA CM/ECF

Honorable William H. Pauley III
United States District Judge
United States District Court for the Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: *In re Topical Corticosteroid Antitrust Litigation*, 16-mc-7000 (Master Case Docket)

Dear Judge Pauley:

The undersigned Defendants respectfully submit this letter with respect to paragraph 21 of Your Honor's Amended Master Case Order, filed February 3, 2017, which directed the named Defendants who had not yet appeared to advise the Court by letter the counsel they wish to designate for the above-captioned master case docket.

Based upon the operative complaints at the time of the Order, this directive applied to the following four entities: Novartis International AG; Novartis AG; Sun Pharmaceutical Industries, Ltd.; and Teva Pharmaceutical Industries, Ltd. These entities were not properly served with any complaints in the consolidated and coordinated corticosteroid antitrust litigation, nor have they appeared. Pursuant to the Order, both the Direct Purchaser and End Payor Plaintiffs filed their consolidated amended complaints on February 10, 2017. Neither of those consolidated amended complaints names any of these four entities as defendants. As a result, we respectfully submit that Novartis International AG; Novartis AG; Sun Pharmaceutical Industries, Ltd.; and Teva Pharmaceutical Industries, Ltd. need not designate counsel with respect to this case and should be removed from the list of parties to these actions.[1]

[1] The filing of this letter should not be construed as a concession that this Court has personal jurisdiction over these entities.

GOODWIN

Respectfully submitted on behalf of the undersigned:

ARNOLD & PORTER
KAYE SCHOLER LLP

By: /s/ Laura S. Shores
Laura S. Shores
901 Fifteenth Street, NW
Washington, DC 20005
Tel.: (202) 682-3577
Fax: (202) 682-3580
laura.shores@apks.com

Attorneys for Fougera Pharmaceuticals, Inc. and Sandoz, Inc.

VENABLE LLP

By: /s/ Lisa Jose Fales
575 7th Street, NW
Washington, DC 20004
Tel.: (202) 344-4000
Fax: (202) 344-8300
ljfales@venable.com

Attorneys for Taro Pharmaceuticals USA, Inc. and Taro Pharmaceutical Industries Ltd.

GOODWIN PROCTER LLP

By: /s/ Christopher T. Holding
Christopher T. Holding
100 Northern Avenue
Boston, MA 02210
Tel.: (617) 570-1679
Fax: (617) 523-1231
cholding@goodwinlaw.com

Attorneys for Actavis Holdco U.S., Inc. and Teva Pharmaceuticals USA, Inc.